Bay City (mh 9/30/93) 14 (4)

TWC DISTRICT 07

P

TWC# 30134

INSPECTION COVER SHEET

RCRA PERMITTED FACILITIES

HW Permit: 50153

EPA ID#:TX D026040709

Name ofCompany: Hoechst Celanese Chemical Group Bay City

Mailing Address: P.O Box 509, Bay City TX 77404

Site Address : 10 miles Southwest of Bay City on HWY 3057

County: Matagorda Type of Industry: Petrochemical manufacturing

C.O.Use only

GEN/FAC. CLASSIFICATION: Industrial ✓ Municipal ____

FACILITY CLASSIFICATION: Government ____ Commercial ____

OPERATIONAL STATUS : Active

Current Waste Management:

H = Hazardous
I = Class I Non-hazardous
II = Class II Non-haz.
III = Class III Non-haz.

Generator	H, I, III, II
Treatment	I, H, II
Storage	H, I, III, II
Disposal	H, I, II, III
Transporter	
Pending Notification and Waste Determination	

H W Permitted F(circle codes): (C) T (SI) closed WP LT (LF) closed I TT TR (WDW)

H W Interim St. Fac.(circle): C (T) SI WP LT LF I TT TR WDW (Boilers)

H W Permit-Exempt Facilities : SA (C) (T)

N HO FACILITIES (circle codes): (C) (T) (SI) WP (LT) (LF) (I) TT TR (WDW)
(double circle if permitted)

TYPE OF INSPECTION (circle) : CEI SPL NRR CME CSE CDI OAM CAO

(OTH (+ reason)) 04 = complaint 06 = closure insp.
22 = SPL results (34 = UIC insp.)
46 = DOD insp 50 = multi-media In
61 = state fee bill insp.

Inspector's Name and Title Nadia Hameed, Field Investigator

Inspection Participants Kay Martha Williams, Environmental Engineer

Date(s) of Inspection March 31, 93 (begin) April 15, 93 (end)

Signed: N. Hameed May 10, 93 (date) Approved: [signature] 5/13/93 (date)
for Susan Bredehoeft

SEP 20 1993

11/91

TEXAS WATER COMMISSION

UIC

DISPOSAL WELL INSPECTION CHECKLIST

Permit # WDW 14 Inspection Date(s) March 31, April 15, 93

TWC Inspector(s) Nadia Hameed. (Print) District 07

Permittee Name Hoechst Celanese Company Well # 2

Inspection Type: (Regular) Follow up
Facility Type: Commercial (Non-commercial)

Company Reps/Guides	Title	Phone
Kay Martha Williams	Environmental Engineer	409-241-4123

Section 1 PRE-INJECTION FACILITIES

1. Are facilities managing hazardous wastes? There are interim status tanks which are waiting for an exemption as a totally enclosed treatment system. (Yes) No NA
2. Facilities covered under RCRA Permit? Yes (No) NA
3. Are facilities exempted from permitting requirements? Yes (No) NA
4. Description of preinjection facilities Preinjection facilities consist of: Two Storage Tanks 1210 and 1211, Two neutralization Tanks - V-693 and V-1224 Primary Filters V-151 and V-150, Polishing Filters V-152, V-153, V-662, V-663 and a Surge Tank V-1226.
5. Evidence of leaks or spills? (If yes, note in comments) Yes (No) NA
6. In the permit for this facility, are the 31 TAC Chapter 331 rules incorporated by reference? (Yes) No

Note to the inspector: If the answer to the above question is "No", then only the provisions specifically stated in the permit are required to be met. In these cases any reference for a potential violation must cite the permit provision, not the rules.

Section 2 UIC FACILITIES

	COMPLIANT?
1. Is a legible sign with company name, company well number and TWC permit number posted at the well site? *TAC 331.66(a)(1)*	(Yes) No NA
2. Is an all weather road to the well installed and maintained? *TAC 331.66(a)(2)*	(Yes) No NA
3. Is wellhead painted (if appropriate), maintained in good working order, without leaks? *TAC 331.66(a)(3)*	(Yes) No NA
4. Whenever the well is operating, are trained staff on location and able to operate the well and respond to alarms? *TAC 331.64(c)(2)*	(Yes) No NA

Note: All noncompliances must include comments.

TEXAS WATER COMMISSION

UIC DISPOSAL WELL INSPECTION CHECKLIST

Permit # WDW 14 Inspection Date(s) March 31 + April 15,

Section 2 UIC FACILITIES (continued)

	GAUGE	RECORDER	PERMIT LIMIT	COMPLIANT?
5. Inj. Pressure *TAC 331.63(a); 331.64(b); 331.64(c)*	510	510	900 psig	(Yes) No NA
6. Annulus Pressure *TAC 331.64(b); 331.64(c)*	720	702	- psig	(Yes) No NA
7. Differential Press. *TAC 331.63(c)*	210	192	min 100 psi	(Yes) No NA
8. Injection Rate *TAC 331.63(d); 331.64(c)*	(Red)	200	750 gpm (max)	(Yes) No NA
9. Inj. Fluid Temperature *TAC 331.64(c)*	(Blue)	104 °F		Yes No (NA)

	VALUE	HOW MEASURED	PERMIT LIMIT	COMPLIANT?
10. pH *TAC 331.63(f)*	7.05	Strip Chart	5.0 min	(Yes) No NA
11. Fluid Density *TAC 331.63(f)*	1.007	Grab	1.10 max	(Yes) No NA

12. Are annulus fluid volume continuous recorders used? *TAC 331.62(d)(4); 331.64(c)* (Yes) No NA

13. Are injection fluids sampled and analyzed sufficiently to yield representative data about characteristics? *TAC 331.64(a); 331.65(b)(3)(C); 331.67(a)(2)(A)* (Yes) No NA

14. Are gauges installed and maintained in proper working order at all times? *TAC 331.64(b)* (Yes) No NA

15. Are recorders installed and maintained in proper working order at all times? *TAC 331.64(c)* (Yes) No NA

16. Are recorders and other required instruments housed in weatherproof enclosures? *TAC 331.64(c)* (Yes) No NA

17. Are Automatic alarms and shutoff devices installed and operational? (Auto shutoff not required if owner/operator certifies to TWC that trained operators are always present when well is operating.) *TAC 331.64(c)(1)* (Yes) No NA

18. Are quarterly corrosion monitoring tests performed and recorded? *TAC 331.64(f)(1)* (Yes) No NA

19. Are all gauges, pressure sensing and recording devices tested and calibrated quarterly? *TAC 331.63(e)* (Yes) No NA

Note: All noncompliances must include comments.

TEXAS WATER COMMISSION

UIC

DISPOSAL WELL INSPECTION CHECKLIST

Permit # WDW 14 Inspection Date(s) March 31, April 15, 9

Section 3 RECORDS REVIEW

	COMPLIANT?		
1. Are self reported data submitted as required by permit and rules? *TAC 331.65(b)(1) or 331.65(b)(2)*	(Yes)	No	NA
2. Are complete and accurate records maintained as required by permit and rules? *TAC 331.67(a), (b) and (c)*	(Yes)	No	NA
3. Are records available for review by Commission representative? *TAC 331.67(b)*	(Yes)	No	NA
4. Are all records retained throughout the life of the well? *TAC 331.67(c)*	(Yes)	No	NA
5. Has an injection zone annual report been submitted with December self reported data? *TAC 331.65(b)(3)*	(Yes)	No	NA
6. Did permittee notify TWC and get approval before beginning any well workovers that require taking well out of service? *TAC 331.63(g)*	(Yes)	No	NA
7. Was mechanical integrity test performed following any well workovers? *TAC 331.63(h)*	(Yes)	No	NA
8. Has an annual mechanical integrity test been performed? *TAC 331.64(d)*	(Yes)	No	NA

Date of last MIT Dec 1, 1992 Due date of next MIT Dec 1993

9. Has an annual pressure falloff test been performed? *TAC 331.64(g)(2)* Dec 1, 1992	(Yes)	No	NA
10. Does permittee currently have sufficient financial assurance to meet permit requirements? Amount of financial security required by permit $82,000.00	(Yes)	No	NA
11. Does permittee comply with land disposal restriction regulations for UIC wells? *40CFR part 148*	(Yes)	No	NA

Section 4 ABANDONED WELLS

1. Is a permanent marker with permit number, date abandoned, and company name placed at the plugged well? *TAC 331.46(k)*	Yes	No	(NA)
2. Are all required monitoring parameters for abandoned wells performed and reported? *TAC 331.46, 331.68*	Yes	No	(NA)
3. Are all records retained for 5 years after abandonment?	Yes	No	(NA)

Note: All noncompliances must include comments.

(Revised 10/1/91)

TEXAS WATER COMMISSION

UIC

DISPOSAL WELL INSPECTION CHECKLIST

Permit # WDW 14 Inspection Date(s) March 31, April 5, 9

Section 5 SELF REPORTED DATA-RECORDS REVIEW

NOTE: Complete one page per monthly review of records

1. Review of self reported data for October, 1992 (month, year)

	REPORTED VALUE	OBSERVED VALUE	PERMIT LIMIT	COMPLIANT?
2. Max. Inj. Pressure *331.63(a); 331.64(b),(c); 331.67(a)(1)(A)*	514	518	905 psig	(Yes) No NA
3. Min. Annulus Press *TAC 331.64(b),(c); 331.67(a)(1)(B)*	620	620	N/A psig	Yes No (NA)
4. Min. Differential *TAC 331.63(c)*	148	146	100 psi	(Yes) No NA
5. Max. Injection Rate *331.63(d); 331.64 (c); 331.67(a)(1)(C)*	205	206	750 gpm	(Yes) No NA
6. Average Inj. Rate			N/A gpm	Yes No (NA)
7. Total Injection Vol. *TAC 331.67(a)(1)(D)*	8.7941	8.79	5348 million gal	(Yes) No NA
8. Minimum pH *TAC 331.63(f)*	6.55	6.55	5.0 SU	(Yes) No NA
9. Max. Fluid Density *TAC 331.63(f)*	1.0075	1.0075	1.180	(Yes) No NA
10. Inj. Fluid Temp. *TAC 331.64(c)*	N/A	N/A		Yes No (NA)
11. Other Permit Param.	N/A	N/A		Yes No (NA)

Pen Colors and Conversion Factors (optional) _____

Comments

The facility is required by permit Provision VIII.E to measure "fluid density" every 8 hours. It was noted in the inspection that the facility was only measuring the fluid density every 12 hours. This is a violation of the above permit provision.

(Use additional comment sheet if necessary)

Lead Inspector Nadia Hameed N. Hameed May 10 1993

Date Sign Print

Note: All noncompliances must include comments.

(Revised 10/1/91)

DISPOSAL WELL INSPECTION CHECKLIST

Permit # WDW 14 Inspection Date(s) March 31, April 15, 93

Section 6 EPA NO-MIGRATION PETITION APPROVAL CONDITIONS

1. Is the operator disposing of more waste volume than is allowed in the petition conditions ? YES (NO)

   Petition Value 33,480,000 gal Cumulative for 14, 32 + 49.

   Observed Value 8.794 (WDW-14) gal Time Period October
   3.5712 (WDW-32)
   5.0443 (WDW-49)
   Total 17,4095

2. Is the operator's waste stream complying with the specific gravity or density conditions of the petition ? (YES) NO

   Petition Value or Range 1.00 & 1.1

   Observed Value or Range 1.007 Date(s) April 15, 93.

3. Is the operator disposing of any hazardous waste that has a waste code that is not included in the petition condition list of approved waste codes ? YES (NO)

   List wastes being disposed that aren't on the approved list:

   _____

   _____

   _____

Comments:

_____

_____

_____

_____

_____

_____

_____

_____

Note: If the answer to any of the above questions is the bolded answer, this means that the operator may be out of compliance with the EPA approved no-migration petition and the EPA needs to be notified of this situation as soon as possible.

1963006006

ADDENDUM I

TEXAS WATER COMMISSION

January 20, 1987

Celanese Chemical Company, Inc.
P.O. Box 509
Bay City, Texas 77414

RE: Amendment to Permit No. WDW-14

Dear Sirs:

Enclosed is a copy of the referenced permit issued pursuant to your application and Chapter 26 of the Texas Water Code. The permit constitutes an official document which should be kept in your permanent records.

Please continue using the self-reporting forms you have on hand until new forms are forwarded by the Water Quality Division.

Should you have any questions, please contact us.

Very truly yours,

TEXAS WATER COMMISSION

By Mary Ann Hefner
Mary Ann Hefner
Chief Clerk

MAH:lm
Enclosures
cc w/enclosure:
TWC District No. 12
Plant Manager, Celanese Chemical Company

1963016007

PERMIT NO. WDW-14

This permit supersedes and replaces TWC Permit No. WDW-14 issued September 18, 1964 and amended on June 28, 1965 and September 15, 1972.

TEXAS WATER COMMISSION
Stephen F. Austin State Office Building
Austin, Texas

PERMIT to conduct underground injection under provisions of Chapter 26 & 27, Texas Water Code (for hazardous waste disposal wells) and Article 4477-7, Texas Solid Waste Disposal Act

I963016008

I. Name of Permittee:

A. Name Celanese Chemical Company, Inc.

B. Address P. O. Box 509
Bay City, Texas 77414

II. Type of Permit: Regular _____ Amended X

III. Nature of Business: Petro-chemical Plant

IV. General Description and Location of Injection Activity

The injection well will be used to dispose of industrial waste from the Bay City Plant. The well is located 5230 feet south and 2220 feet west of the most northerly northwest corner of the company property which is located on the

CONTINUED on Pages 2 through 8.

The permittee is authorized to conduct injection activity in accordance with limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules and orders of the Commission, and the laws of the State of Texas. This permit is valid for a period of 10 years or until amended or revoked by the Commission.

APPROVED, ISSUED AND EFFECTIVE this 13th day of January, 19 87.

ATTEST: Maylene Hefner

Pam Hapkins
For the Commission

James Moore League, Abstract No. 62, Matagorda County, Texas, approximately 10 miles southwest of Bay City, Texas; 28°51'19" North latitude, 96°01'15" West longitude. Injection will be into the Miocene sands in the approximate subsurface interval between 3300 and 3700 feet.

V. Construction Requirements

A permit for the drilling and operation of this disposal well was issued on September 28, 1964. The permittee set and cemented surface casing to a subsurface depth of 1,369 feet, and long-string casing from the surface into the injection zone to 3,750 feet to properly protect usable quality ground water. Cementing was by the pump and plug method. Cement was circulated outside both casings back to the surface. Except as specifically required in terms of the original permit, construction of the well and the associated facilities was done in accordance with the plans and specifications contained in the permit application. Any proposed changes to the plans and specifications must be certified in writing by the Executive Director that said changes provide equivalent or greater protection than the original design criteria and standards. Any change in well operational parameters will require a permit amendment as specified in 31 TAC Section 305.62.

VI. Character of the Waste Streams

A. Industrial waste permitted to be injected shall consist of the following waste streams; however, wastes not authorized to be stored, processed or handled in associated solid waste surface facilities are expressly not authorized.

1. Wastes generated during closure of the well and associated facilities that are compatible with permitted wastes and the reservoir.

2. Wastes associated with the production of Acetaldehyde, Vinyl Acetate, n-Butyl Alcohol, n-Propyl Alcohol, Iso-Butyl Alcohol, Heptanoic Acid, Nonanoic Acid, Hydrogen, Synthesis Gas, C_7 and C_9 Aldehydes, Propionic Acid, and Fatty Alcohols.

3. Contaminated rainfall runoff, slab wash water, contaminated products, contaminated raw materials, tank car heels, and spillage and wash water from tank car-tank truck cleaning and loading areas.

4. Wastes normally injected into WDW-110, when it is out of service for workover, provided that the pH of injected fluids is adjusted to be no less than 5.0.

B. The pH of injected waste streams shall not be less than 5.0.

C. Except as authorized by the Executive Director for purposes of performing a workover or shutting in the well, the density of injected fluids shall not exceed a specific gravity of 1.10.

VII. Injection Rates and Volumes

A. The combined maximum instantaneous rate of injection into this well, WDW-32 and WDW-49 shall not exceed 750 gallons per minute.

B. The cumulative volume of wastewater injected into this well, WDW-32 and WDW-49 shall not exceed 33,480,000 gallons per month. (Based on 750 gals/min. and a 31 day month)

C. The cumulative volume of wastewater injected into this well, WDW-32 and WDW-49 shall not exceed 394,200,000 gallons per year. (Based on 750 gals/min. and 365 days)

VIII. Operating Parameters

A. The operating surface injection pressure shall not exceed 900 psig.

B. The tubing-long string casing annulus shall be filled with a corrosion inhibiting fluid. A positive pressure with a differential from injection pressure of at least 100 psi shall be maintained on the annulus to detect well malfunctions. Instrumentation shall be installed to detect well malfunctions by both annulus pressure changes and annulus volume changes.

C. Pressure gauges shall be installed and maintained in proper operating conditions at all times on the injection tubing and tubing-long string casing annulus at the wellhead.

D. Continuous recording devices shall be installed and maintained in proper operating conditions at all times to record injection tubing pressure, injection flow rate, injection volumes and tubing-long string casing annulus pressure. The instruments shall be housed in weatherproof enclosures.

Grab samples from every 12 hours required every 8 hours

E. The pH and density of the injected waste shall be monitored continuously or on a batch basis or by grab sample once every 8 hours. Annulus volumes shall be monitored a minimum once each work shift.

F. Mechanical integrity was demonstrated on December 1, 1983 and shall be demonstrated thereafter once every five years for the life of the well.

IX. Reporting Requirements

A. The permittee shall submit to the Commission within twenty (20) days after the last day of March, June, September and December of each year a Report of Injection Operation on forms supplied by the Commission.

B. The permittee shall submit to the Commission annually, with the December operating report, an acceptable report of the pressure effects of the well upon its injection zone, including a direct measurement of bottom-hole pressure, or a calculation of bottom-hole pressure using the specific gravity of fluid in the wellbore and the static fluid level. To the extent such information is reasonably available, the report shall also include:

1. Locations of newly constructed and discovered wells within the Area of Review if such wells were not included in the Technical Report accompanying the permit application or in later reports.

2. A tabulation of data for all newly constructed and discovered wells within 1/2 mile of the injection well and for all such wells within the Area of Review that penetrate to within 300 feet of the top of the injection zone as required by 31 TAC Section 331.65(b) (2) (B).

3. Annual injection fluid analysis.

C. The permittee shall notify the Austin Office of the Commission within twenty-four (24) hours of any change in monitoring parameters or of any other observations which could reasonably be attributed to a leak or other failure in well equipment.

D. The permittee shall submit to the Commission within forty-five (45) days after completion of the following tests a report including both data and interpretation of the results of:

1. Periodic tests of mechanical integrity; and

2. Any other test of the injection well or injection zone if required by the Executive Director.

X. Well Workovers

A. The permittee shall notify the Austin Office of the Commission of any workover or corrective maintenance operation:

1. For major workovers or corrective maintenance operations which involve removal of injection tubing the permittee shall obtain approval of the Executive Director prior to beginning work. Notification shall be in writing and shall include plans for the proposed work. The Executive Director may grant an exception to prior written notification when immediate action is required.

2. For other workovers or corrective maintenance operations the permittee shall notify the Austin Office of the Commission and obtain approval before beginning work.

B. Within sixty (60) days after completion of any workover, a completion report shall be submitted to the Commission including the reason for the well workover and details of the work performed.

C. During major workovers, the bottom-hole pressure shall be determined either by direct measurement using conventional techniques or by calculation using specific gravity of fluid in the wellbore and the static fluid level.

D. All phases of any workover shall be supervised by a person knowledgeable and experienced in practical well engineering, who is familiar with the special conditions and requirements of injection well construction and operation.

E. Mechanical integrity shall be demonstrated following major workovers or corrective maintenance operations which involve removal of injection tubing or perforating.

XI. Plugging

A. Upon final abandonment the well shall be plugged in accordance with plans and specifications contained in the application after mechanical integrity of the well is verified by a program approved by the Executive Director. Any proposed changes to plans and specifications must be certified in writing by the Executive Director that said changes provide protection equivalent to or greater than the original design criteria and standards.

B. The permittee shall notify the Austin Office of the Commission in writing thirty (30) days prior to commencing plugging operations. Within thirty (30) days of completion of plugging operations the permittee shall submit to the Austin Office of the Commission a plugging report on forms provided by the Commission.

C. The permittee shall secure and maintain in full force and effect at all times a performance bond or other form of financial security, in accordance with 31 TAC Section 305.153 (relating to Financial Responsibility), to provide for proper plugging and abandonment of the permitted waste disposal well. The bond or other form of financial security shall be in the amount of $82,000.00. The amount of financial security may, at the discretion of the Texas Water Commission, be altered at a future date to provide for adequate plugging subject to prevailing general economic conditions, as provided by 31 TAC Section 305.62 (pertaining to the amendment of permits). The injection of fluids is not authorized until the permittee secures the performance bond or other form of financial security as described above.

XII. Monitoring and Record Keeping

A. The permittee shall keep complete and accurate records of:

1. All monitoring required in the permit, including:

a. Continuous records of surface injection pressures,
b. Continuous records of the tubing-long string annulus pressures,
c. Continuous records of injection flow rates,
d. Monthly total volume of injected fluids,
e. Annulus volume,

f. Injection fluid pH,
g. Injection fluid density,

2. All periodic well tests, including but not limited to:

a. Injection fluid analysis,
b. Bottom-hole pressure readings,
c. Mechanical integrity.

3. All shut-in periods and times that emergency measures were used for handling waste; and

4. Any additional information on conditions that might reasonably affect the operation of the injection well.

B. All records shall be made available for review upon request from a representative of the Commission.

C. The permittee shall retain, for a period of five (5) years following abandonment, records of all information resulting from any monitoring activities or records required by this permit.

XIV. Other Requirements

A. A sign shall be posted at the well site which shall show the name of the company, company well number and permit number. The sign and identification shall be in the English language, clearly legible and shall be in numbers and letters at least one (1) inch high.

B. An all-weather road shall be installed and maintained to allow access to the disposal well and related facilities.

C. The wellhead and associated facilities shall be painted, where appropriate, and maintained in good working order without leaks.

D. The following rules are incorporated in this permit by reference:

Permit Characteristics and Conditions,
31 TAC Subchapter F, Sections 305.121-128
Additional Conditions for Injection Well Permits,
31 TAC Subchapter H, Sections 305.151-160

E. No discharge of wastes, other than those waste streams specified in Paragraph VI of this permit injected into the Miocene Sands in the subsurface between approximately 3300 and 3700 feet is authorized by this permit from this facility into water in the State.

F. Within thirty (30) days after permit approval, the permittee shall provide written notice to the Executive Director that a copy of the permit has been filed with the health and pollution control authorities of the county, city or town where the well is located.

G. All solid waste managed at the facility shall be managed in accordance with 31 TAC Chapter 335, Rules for Industrial Solid Waste and Municipal Hazardous Waste.

H. The permittee is subject to the provisions of 31 TAC 305.125.

Texas Water Commission

INTEROFFICE MEMORANDUM

To: FILE Date: May 14, 1993

Thru: Ben Wesley, UIC Coordinator, Program Services Unit
Field Operations Division

From: Nadia Hameed, Field Investigator
District 7 - Houston

Subject: Hoechst Celanese - Permit No. WDW-14
TWC Registration No. 30134
Underground Injection Control Inspection
Conducted March 31 and April 15, 1993

I. INTRODUCTION

On March 31 and April 15, 1993, Nadia Hameed of the Texas Water Commission (TWC) District 7 office conducted an Underground Injection Control (UIC) inspection at the above referenced facility. Participating in the inspection on behalf of Hoechst Celanese was Kaymartha Williams.

II. WASTES GENERATED

The facility is presently only using one deep well WDW-14 for hazardous waste injection. The wastes sent into this well primarily originate from the acetaldehyde unit. These consist mainly of K009 and K010, listed wastes and any makeup water from the acetaldehyde unit. In addition the well is approved to dispose of D001, D002, U001, U002, U031, U112, U123, U140, U154, U197, U226, F001, F002 and hexavalent chromium.

III. WASTE MANAGEMENT FACILITIES

The pre-injection facilities mainly consist of:

Two storage tanks 1210 and 1211, where the waste is stored initially. From here it is sent to two neutralization tanks V-693 and V-1224 and then it is routed via primary filters V-151 and V-150 and polishing filters V-152, V-153, V-662 and V-663 to surge tank V-1226 and then into the deep well.

Presently these tanks that are associated with this system are interim status tanks. The facility, however, has applied

to the TWC for an exemption of these tanks from RCRA regulation as they consider these tanks to be part of a totally enclosed system. No decision has yet been reached.

IV. VIOLATION

o The facility is required by the Permit Provision VIII. E. to measure the fluid density every 8 hours. It was noted in the inspection that the facility was measuring the fluid density once every 12 hours (i.e once per shift) for the well above.

This information is submitted as file data.

Signed: _____
Nadia Hameed
Field Investigator

Approved: for _____
Susan D. Brodehoeft
Program Manager
Industrial and Hazardous Waste Program
District 7 - Houston

SDB/NH/tl